

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Numbering Resource Optimization

)
)
)
)
)
)

CC Docket No. 99-200

**COMMENTS AND PETITION TO SUBSTITUTE ALTERNATIVE NPA
OF THE ALABAMA PUBLIC SERVICE COMMISSION**

On October 17, 2001, the Common Carrier Bureau (Bureau) of the Federal Communications Commission (FCC or Commission) released a Public Notice seeking comment on the National Thousands-Block Number Pooling Rollout Schedule in this proceeding. The Alabama Public Service Commission (Alabama PSC) hereby submits its comments on the proposed schedule as well as its Petition to Substitute Alternative NPA, pursuant to the Public Notice.

After a review of the proposed national thousand-block number pooling rollout schedule, the Alabama PSC has concerns about the proposed schedule for NPAs 251, 256 and 334. While the proposed schedule appears to provide the introduction of thousand block pooling in all of the Alabama NPAs before the currently forecasted exhaust dates, the Alabama PSC is concerned about the sequence of implementation of the pooling

The schedule proposes to implement pooling for the 251 NPA in the second quarter rollout. The 251 NPA for Mobile was just implemented on June 18, 2001 for permissive dialing and will have mandatory dialing as of January 7, 2002. NPA 251 is not projected to exhaust until the first quarter of 2011. NPA 256 for Huntsville, however, is scheduled for pooling in the seventh quarter but it is projected to exhaust in the third

quarter of 2005. The Montgomery NPA 334 is scheduled for pooling in the eighth quarter but is projected to also exhaust in the third quarter of 2005. The scheduled pooling for NPA 205 in the second quarter of the rollout is appropriate as the projected exhaust date for 205 is the third quarter of 2004.

Pursuant to the Public Notice and paragraph 165 of the *First Report and Order* Alabama PSC submits its Petition to substitute an alternative schedule for the proposed rollout of thousand-block number pooling for the Alabama NPAs. The Alabama PSC petitions to substitute the Huntsville area NPA 256 set for pooling in the seventh quarter of the rollout, for the recently established Mobile NPA 251 set for pooling during the second quarter rollout. The Huntsville area is a fast growing area with a strong emphasis on high technology industries. This area had a geographic area split from NPA 205 in September of 1998 and is projected to reach exhaust in the third quarter of 2005. The public interest would be better served by substituting the Huntsville 256 NPA in the rollout schedule for the Mobile metro area 251 NPA that will not exhaust until 2011.

Additionally, the Alabama PSC is concerned that the Montgomery area NPA 334 is also projected to exhaust in the third quarter of 2005 and is not scheduled for the pooling rollout until the eighth quarter. The Montgomery area has a large military presence, serves as the state capital and is experiencing additional growth. If possible Alabama would propose also moving the 334 pooling rollout to the second quarter schedule or some other earlier quarter. At a minimum, the Alabama PSC requests that the 334 NPA be moved from the eighth quarter rollout to the seventh quarter rollout were the 256 NPA was originally scheduled and move the 251 NPA rollout to the eighth

quarter. The Alabama PSC proposes the following revised schedule for the rollout of thousand block number pooling in Alabama MSAs.

Scheduled Rollout Quarter	Proposed NPA Rollout Schedule	Alabama Recommended Rollout Schedule	Projected Exhaust Date
2 nd Quarter	251	256	3Q 2005
2 nd Quarter	205	205	3Q 2004
7 th Quarter	256	334	3Q 2005
8 th Quarter	334	251	1Q 2011

In conclusion, The Alabama PSC supports the use of thousand number pooling to help conserve numbering resources to extend the life of the North American Numbering Plan. The Alabama PSC requests basically three changes to the proposed schedule:

1. Move 256 NPA to the second Quarter.
2. Move 334 NPA to the second Quarter also if possible if not move 334 NPA to the seventh Quarter.
3. Move 251 to the eighth quarter.

Respectfully submitted,

Alabama Public Service Commission

Dated: November 6, 2001